

Exhibit 3



MotleyRice

Robert T. Haefele
Licensed in NJ & PA
DIRECT DIAL 843.216.9184
DIRECT FAX 843.216.9450
RHaefele@motleyrice.com

April 10, 2006

VIA HAND DELIVERY

J. Michael McMahon, Clerk of the Court
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: Burnett, et al v. Al Baraka Inv. & Dev. Et al, Case No. 03-CV-9849

Dear Clerk of the Court:

We are writing in response to the April 7, 2006 letter David E. Nachman of DLA Piper Rudnick Gray Cary sent to you on behalf of his client, Abdulla Bin Khalid Al Thani. Defendant Al Thani was added to the complaint on December 30, 2005 and served via publication, as permitted by an order of the court.

Rather than assuming that Mr. Nachman is endeavoring intentionally to mislead this Court into believing wrongly that Mr. Nachman's client is not a defendant in the above-referenced matter, we are giving Mr. Nachman the benefit of the doubt and assuming that he merely acted in haste and was merely mistaken about his claim that his client is not a defendant in the case. Instead of writing to the Court in haste – and boldly threatening sanctions against counsel for what could have been, but apparently was not, an oversight – if Mr. Nachman had either consulted plaintiffs' counsel in advance of his letter writing effort or checked the docket entries for addition of defendants, he would have learned that his client, Abdulla Bin Khalid Al Thani, is indeed a defendant in the case.

Contrary to Mr. Nachman's assertion that Abdulla Bin Khalid Al Thani is not a defendant in the case, that individual was added to the above-referenced action in an amended pleading filed with the United States District Court for the District of Columbia as Docket Entry Number 438 on December 30, 2003, before the case was transferred to the United States District Court for the Southern District of New York, and was included in the service by publication on January 13, 2005, filed with the Court on March 4 and 16, 2005. Attached to this letter are copies of the amended pleading filed on December 30, 2003, as well as Plaintiffs' More Definite Statement as to Defendant Abdullah bin Khalid bin al-Thani, filed on September 27, 2005.

www.motleyrice.com

Motley Rice LLC
Attorneys at Law



MT. PLEASANT

28 BRIDGESIDE BLVD.
P.O. BOX 1792
MT. PLEASANT, SC 29465
843-216-9000
843-216-9450 FAX

BARNWELL

1750 JACKSON ST.
P.O. BOX 365
BARNWELL, SC 29812
803-224-8800
803-259-7048 FAX

PROVIDENCE

321 SOUTH MAIN ST.
P.O. BOX 6067
PROVIDENCE, RI 02940
401-457-7700
401-457-7708 FAX

HARTFORD

ONE CORPORATE CENTER
20 CHURCH ST., 17TH FLOOR
HARTFORD, CT 06103
860-882-1681
860-882-1682 FAX

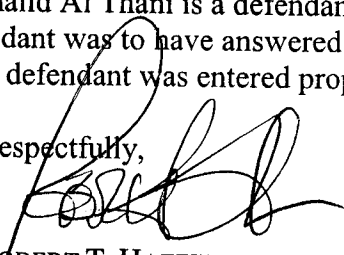
ATLANTA

600 WEST PEACHTREE ST.
SUITE 800
ATLANTA, GEORGIA 30308
404-201-6900
404-201-6959 FAX

J. Michael McMahon, Clerk of the Court
Re: Case No. 03-CV-9849
April 10, 2006
Page 2 of 2

Inasmuch as defendant Abdulla Bin Khalid Al Thani is a defendant in the case, has been served, and the time period within which defendant was to have answered the Complaint has now run, the Order entering default against this defendant was entered properly.

Respectfully,



ROBERT T. HAEFELE

Enclosures

cc: Hon Richard C. Casey, U.S.D.J.
David E. Nachman, Esq. (via federal Express)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

THOMAS E. BURNETT, SR., <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.: No. 1:02CV01616(JR)
)	
AL BARAKA INVESTMENT AND)	
DEVELOPMENT CORPORATION, <i>et al.</i> ,)	
)	
Defendants)	

**PLAINTIFFS' DECEMBER 30, 2003 ADDITION OF PARTIES
PURSUANT TO CASE MANAGEMENT ORDER NO. 1. AND FEDERAL
RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Case Management Order No. 1 and Federal Rule of Civil Procedure 15(d), the Defendants listed on Attachment A are hereby added as additional Defendants in this civil action.

Dated: December 30, 2003

Respectfully submitted,

/s/ Harry Huge

Harry Huge, Esquire
HARRY HUGE LAW FIRM, LLP
Market Square North
401 Ninth Street, N.W., Suite 450
Washington, DC 20004
Phone: (202) 824-6046
Fax: (202) 318-1261

Attachment A

Additional Defendants as of December 30, 2003

- Mohammed Al Faisal Al Saud (D84)
- Abdulla bin Khalid al Thani (D226)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**Civil Action No.
03 MDL 1570 (RCC)**

This document relates to:

*Thomas E. Burnett, Sr., et al. vs. Al Baraka Investment and Development Corp., et al.,
Case No. 03-CV-5738, 03-CV-9849 (S.D.N.Y.)*

*Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., Case
No. 04-CV-7279 (S.D.N.Y.)*

*World Trade Center Properties, et al. v. Al Baraka Investment and Development Corp, et
al., Case No. 04-CV-7280 (S.D.N.Y.)*

**PLAINTIFFS' MORE DEFINITE STATEMENT AS TO
DEFENDANT ABDULLA BIN KHALID AL THANI**

Counsel for the above-captioned Plaintiffs hereby provide a more definite statement as to Defendant Abdulla Bin Khalid Al Thani. This statement, annexed hereto as Exhibit 1, is hereby incorporated into the consolidated Complaints pursuant to the Court's Case Management Order No. 1, dated March 10, 2004, and Case Management Order No. 2, dated June 16, 2004, paragraph 13.

Dated: September 27, 2005

Respectfully submitted,

/s/

Michael E. Elsner, Esq. (NY - ME8337; VA-41424;
SC-72893)

Ronald L. Motley, Esq. (SC-4123)

Jodi Westbrook Flowers, Esq. (SC-66300)

Donald A. Migliori, Esq. (RI-4936; MA-567562;
MN-0245951)

Robert T. Haefele, Esq. (NJ-58293; PA-57937)

Justin B. Kaplan, Esq. (TN-022145)

John Eubanks (MD)

MOTLEY RICE LLC

28 Bridgeside Boulevard

P.O. Box 1792

Mount Pleasant, South Carolina 29465

Telephone: (843) 216-9000

Jayne Conroy, Esq. (NY-JC8611)
Paul J. Hanly, Jr., Esq. (NY-PH5486)
Andrea Bierstein, Esq. (NY-AB4618)
HANLY CONROY BIERSTEIN
& SHERIDAN, LLP
112 Madison Avenue, 7th Floor
New York, NY 10016-7416
Tel: (212) 784-6400

Attorneys for Plaintiffs

EXHIBIT 1

**Plaintiffs' More Definite Statement as to
Defendant Abdullah bin Khalid bin al-Thani**

Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC), including all of the allegations and claims contained therein.

1. Abdallah bin Khalid bin al-Thani is a member of the al-Thani ruling family of Qatar and the Minister of Waqf (Endowments) and Islamic Affairs, who rose to prominence as the head of the army's elite Armored Regiment.
2. Sheikh al-Thani's name, prior to the events of September 11, has appeared on government lists of individuals under investigation for financing terrorism. Al-Thani was known to have aided and harbored terrorists and al Qaeda officers, such as Defendant Khalid Sheikh Mohammed, Mohammed Atef, Ayman Zawahiri, and Abu Mussab al-Zarqawi.
3. In the mid-1990's, when Sheikh al-Thani was the Qatari Minister of Religious Affairs, he hosted Defendant Khalid Sheikh Mohammed ("KSM"), admitted architect of the September 11, 2001 attacks and a senior al Qaeda member, at his farm outside Doha. At this time, KSM was wanted by US officials, following a grand jury indictment in the Southern District Court of New York, which accused KSM of masterminding the Bojinka plot, a plan to down several American airliners operating in Southeast Asia. Others convicted in the Bojinka Plot include mastermind of the 1993 World Trade Center bombing Ramzi Yousef as well as Yousef's roommate and accomplice in the Philippines, Abdul Hakim Murad.
4. FBI officials have speculated that KSM may have been tipped off by al-Thani before agents were granted permission to enter Qatar and arrest him in 1996. Retired CIA officer Robert Baer said that once the agents arrived, the Head of Qatar's National Security indicated that a member of the ruling family (most likely al-Thani) ordered him to issue blank passports to four individuals. These included KSM, as well as top bin Laden aides Mohammed Atef and Ayman Zawahiri. Zawahiri is also the founder of Specially Designated Global Terrorist (S.D.G.T.) the Egyptian Islamic Jihad.

5. In late 2001, Saudi intelligence has indicated that KSM may have spent two weeks in Qatar “with the help of prominent patrons” that most likely included al-Thani, amongst others.

6. Furthermore, intelligence reports have indicated that al-Thani operated a safe house (possibly the same farm where KSM stayed) for another high-ranking al Qaeda official, Abu Mussab al-Zarqawi. Zarqawi is believed to have provided chemical and explosives training to S.D.G.T. Ansar al-Islam, an al Qaeda affiliated organization which operates in Kurdish Northern Iraq. Zarqawi, according to Colin Powell’s February 6, 2003 address to the UN Security Council, created the environment for which “nearly two dozen extremists converged on Baghdad and established a base of operations there.” Officials have also indicated that al-Thani “provided Qatari passports and more than \$1 million in a special bank account to finance the network” in Baghdad.

7. Al-Thani has been characterized by the Baghdad publication *al-Thawrah* as the “standard bearer” of the Qatari fundamentalists and a strong driving force behind the “alliance deal struck between the State of Qatar and the Emirate of Afghanistan” during the rule of the Taliban. The same article makes references to reports that suggest Osama bin Laden himself, not Mullah Mohammed Omar, was actually in charge of the Afghani delegation at these meetings, citing the existence of “a shadowy relationship” between al-Thani and bin Laden. Al-Thani has also been known to align himself ideologically with the top Muslim cleric in Qatar, Defendant Dr. Yusuf al-Qardawi, who is the head of the Muslim Brotherhood in Qatar and has frequently called upon Muslims in Qatar to wage holy war against Israel and the West.